

In The United States District Court
for The middle District of Alabama
NORTHERN Division

Jimmy Frank Cameron
plaintiff

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LEOLA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CASE NO. 0206-CV-1115 M.H.T

Commissioner Richard Allen
P.H.S. Et. AL
Doctor Siddiq Defendants

Rebuttal of Defendant Special Report

Come Now Jimmy Frank Cameron and files This Rebuttal
To The Defendants Special Report

1. Plaintiff Does say That He has been Denied Adequate medical Treatment at Bullock Correctional Center. By Doctor Siddiq and P.H.S by giving Plaintiff Cosmetic Treatment and by giving Plaintiff medication That he Has Allergies To

Plaintiff says as for Commissioner Allen Controlling P.H.S That he is Responsible for Them. "P.H.S not Doing what They are Paid Good money To Do!" Defendants have not under Taken any Review of Plaintiff Claims are givin any Adeqeo medical Treatment as of This Date! 2-10-07

SCANNED

1. Plaintiff Has Proof of ALL His ALLEGATIONS. Plaintiff medical Records! Will Prove ALL!"

- 2 Plaintiff Plainly States a Claim of Violating 8 and 14 Amendment
- 3 plaintiff is entitled To ALL Relief Sought," Because of Denial OF Adequate Medical Treatment
- 5 The Defendants Do NOT fit The Qualified immunity clause. Plaintiff Plainly Told Doctor Siddig That Plaintiff was not suppose To Take The prescribed medication That Doctor Siddig gave To Plaintiff (see (Medical Records)) Defendants clearly Violated Constitutional Right of Plaintiff by Knowing giving plaintiff medication That Plaintiff has Allergy To and was not suppose To Take (see Allergys in Medical Files)
6. AS Defendant Show and Admitte That Plaintiff has a SERIOUS medical Problem on Page 9 and Doctor Siddig Refused To give Plaintiff Adequate Medical Treatment Plaintiff has Pinched Nerves on his Spine which causes Great Pain and Discomfort
7. The Defendants ^{ADMIT} That Plaintiff Allegations could be Proven That They would amount To mere Negligence - But They are clearly a Denial OF Adequate Medical Treatment Delany v. Carahan 132 F.3d 1234, 1240-41, 8 Cir 1997 Grossly incompetent or inadequate care constitute Deliberate indifference in violation OF The 8 Amendment where The Treatment is so inappropriate as To evidence intentional mal/treatment or a refusal To Provide Essential care. McElligot v. Foley 182 F.3d 1248, 1257, 11 Cir (1999) (Jury could find That Treatment... was so cursory To amount To no Treatment AT ALL. ANCATA v Prison Health

SERVICES INC.) CURSORY means something Done Quickly But not well." Hathaway v. Coughlin 37 F.3d 63, 68 2d Cir. 1994 NOR Does The fact That The (Prison Doctor) Frequently examined HATHAWAY NECESSARILY VINDICATE him. A JURY could infer Deliberate indifference from The fact The Doctor Knew The extent of HATHAWAY'S PAIN. KNEW THAT The Course of Treatment WAS Largely enefective and declined To do any thing more To Attempt To improve HATHAWAY Condition." Murrell v. Bennett 615 F.2d 306, 310, p 4 5th Cir. Plaintiff HAS exhausted ALL Administrative Remedies and filed medical complaints and Grievances. Plaintiff has been charged around \$30.00 since being here AT Bullock Prison for CO. Payments. The Eight Amendment Requires Prison officials To Provide Human Conditions of Confinement." Prison officials MUST ensure That inmates Receive Adequate Medical Care. Quoting Hudson v. Palmer 468 U.S. 517, 526-5. 1984 But After incarceration The UNNECESSARY AND WANTON infliction of Pain Constitutes Cruel and UNUSAL Punishment for bidden by The Eight Amendment Whitley 475 U.S. AT 319 Quoting Ingraham v. Wright 430 U.S. 651-670 (1977) Plaintiff Told The Defendants That what They were Doing WAS wrong." But Doctor Siddig SAID he would Do it ANY way. Plaintiff would Dismiss Richard Allen as A Defendant" AND Continue This civil ACTION against Prison Health Services and Doctor Siddig. for Violation of 8 and 14 AMENDMENT!!

Date 2-10-07

Jimmy T. Cameron
Plaintiff

CERTIFICATE of SERVICE

I do certify That on The 10 Day of February 2007
I MAILED A copy of The forgoing To The Defendant
by Placing A copy in The Free Legal MAIL here
At Bullock Correctional Center

Alabama Department of Corrections

LEGAL Division

P.O. Box 301501

Montgomery, ALA

36130

Date 2-10-07

Jimmy Frank Carver
Plaintiff

Jimmy Cameron 105591
P.O. Box 5707 C1-7A
Union Spring, ALA

36089-5707



United States District Court

P.O. Box 711

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